

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Noble Drew Ali, et al.,	:	No. 5:18-CV-5655
Plaintiffs,	:	
	:	(Complaint filed 1/14/19)
v.	:	
	:	(Honorable Joseph F. Leeson, Jr.)
Judge Mary Mongiovi Sponaugle, et al.,	:	
Defendants.	:	(Electronically Filed)
	:	JURY TRIAL DEMANDED

**MOTION FOR INJUNCTION AGAINST FURTHER FRIVOLOUS FILINGS BY
PLAINTIFFS, BY DEFENDANTS MARK SHIVERS (OFFICIAL CAPACITY),
OFFICER SNYDER (OFFICIAL CAPACITY), AND TOM RUDZINSKI, CHIEF OF
MANHEIM TOWNSHIP POLICE DEPARTMENT**

1. This Motion is based on a string of frivolous documents and pleadings submitted by Plaintiffs.

2. In situations where litigants bombard opposing counsel and the Court with continual meritless filings, the Court is empowered by the All Writs Act to enjoin “abusive, groundless and vexatious litigation.” *Brow v. Farrelly*, 994 F.2d 1027, 1038 (3d Cir. 1993).

3. Moving Defendants request an injunction on this basis.

4. The injunction should be limited to the period of time necessary for the Court to decide all of the Defendants’ Motions to Dismiss and be confined to Plaintiffs’ filings in this litigation.

WHEREFORE, this Court should enter the proposed order and enjoin Plaintiffs from submitting further filings in this matter until all of the Defendants’ Motions to Dismiss have been decided.

Respectfully submitted,

Lavery Law

DATE: May 30, 2019

By: s/Frank J. Lavery, Jr.

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CERTIFICATE OF SERVICE

I, Katy Reilly, an employee with the law firm of Lavery Law, do hereby certify that on this 30th day of May, 2019, I served a true and correct copy of the foregoing Motion to Enjoin upon all parties of record as indicated below:

Via First Class Mail:

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Via E-Filing:

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Attorney for Defendants Magisterial District Judge Mary Mongiovi Sponaugle, Honorable Howard F. Knisely, and Magisterial District Judge David P. Miller

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s/Katy Reilly
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